

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiff,

vs.

COLLINS MURPHY, SHARON HAMMONDS,
BRENDA F. WATKINS, LIMESTONE
UNIVERSITY, MG FREESITES, LTD., d/b/a
PORNHUB.COM, MG FREESITES II LTD.,
MINDGEEK S.A.R.L., MINDGEEK USA,
INC., MG BILLING LTD., and HAMMY
MEDIA LTD. d/b/a XHAMSTER.COM,
TRAFFICSTARS LTD., WISEBITS LTD,
XHAMSTER IP HOLDINGS LTD, WISEBITS
IP LTD,

Defendants.

Case No.: 7:20-cv-00947-DCC

**DEFENDANT MG FREESITES, LTD.’S CONSENT MOTION
FOR EXTENSION OF TIME FOR ADDITIONAL PARTIES TO RESPOND TO
AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant MG Freesites, LTD., d/b/a Pornhub.com (“MG Freesites”) files this Consent Motion for Extension of Time for Additional Parties to Respond to Plaintiffs’ Fifth Amended Complaint (Dkt. No. 193), and in support thereof states as follows:

1. On August 16, 2022, Plaintiffs sent requests for Waivers of Service to counsel for MG Freesites with regard to several entities added by Plaintiffs as defendants to the Fifth Amended Complaint.
2. Pursuant to Rule 4(d)(3), an answer is due 60 days after the request is sent for a U.S. party and within 90 days for an international party.

3. Counsel for MG Freesites anticipates filing jurisdictional motions for several of the added entities, one of which is a U.S. entity. Thus, under Rule 4, counsel would normally be required to file one jurisdictional motion on October 17, 2022 and a second jurisdictional motion on November 14, 2022.

4. However, the parties are in agreement that it would substantially serve judicial economy, conserve party resources, and simplify the issues for briefing if the parties are able to undertake one course of briefing on the anticipated jurisdictional challenges.

5. Accordingly, Plaintiffs and counsel for MG Freesites have agreed that it is in the interests of judicial economy and efficiency to set one deadline (November 14, 2022) for Mindgeek S.A.R.L., Mindgeek USA, Inc. and MG Billing, Ltd. to respond to the Fifth Amended Complaint.

6. As for MG Freesites II, Ltd., counsel for MG Freesites intends to submit to this Court documentation that MG Freesites II, Ltd. is a non-existent entity, and thus cannot be served with process regarding, or respond to, this lawsuit. The parties likewise agree that it serves judicial economy for that submission to be made as part of the anticipated jurisdictional motion on or before November 14, 2022.

7. Federal Rule of Civil Procedure 6(b) allows this Court discretion to enlarge periods of time for good cause where, as here, the requested extension is made before the deadline. The parties agree that the interests of judicial economy and efficiency justify the requested extension.

8. The requested extension is not sought for dilatory reasons or for any other improper purpose, will not affect any other deadlines, and will not prejudice any party or the Court. The parties agree that neither will be prejudiced by the requested extension of time.

9. Plaintiffs consent to Defendant MG Freesites's request.

WHEREFORE, Defendant MG Freesites respectfully requests this Court enter an order enlarging the time within which to respond to the Fifth Amended Complaint until and including November 14, 2022.

WE SO MOVE:

DATED: October 10, 2022

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,
P.A.

By: /s/ Mark B. Goddard

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WE CONSENT:

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